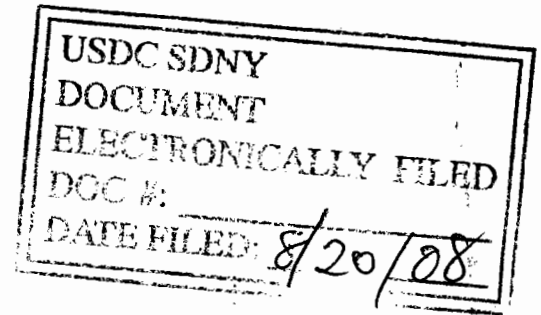
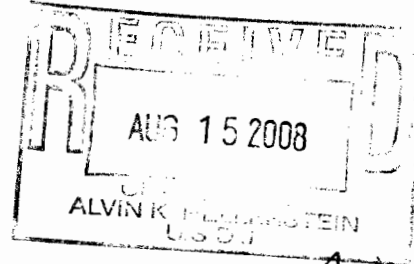


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Attorneys for Plaintiffs

World Trade Center Properties LLC
1 World Trade Center LLC
2 World Trade Center LLC
3 World Trade Center LLC
4 World Trade Center LLC



- and -

Attorneys for the Following Fourteen
Non-Parties Served With Subpoenas:

Stanley Chera
Jane Goldman
Katja Goldman
Dorian Goldman
Lloyd Goldman
Emzon Shung
Michael Sonnenfeldt
Friedman LLP
Silverstein East WTC Facility Manager LLC
Silverstein WTC LLC
Silverstein WTC Properties LLC
WTC Management and Development LLC
WTC Investors LLC
BLDG Management Company Inc.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE SEPTEMBER 11 PROPERTY DAMAGE
AND BUSINESS LOSS LITIGATION

21 MC 101 (AKH)

**NOTICE OF MOTION FOR
PROTECTIVE ORDER**

This document also relates to:
08 CIV 3719
08 CIV 3722

*The discovery complained of
will be regulated at the conclusion
of argument on the Aviation Def't's
motion for summary judgment.
The motion for a protective
order, therefore, is denied, as/out
prejudice to renewal after
such regulation.*
8-20-08
[Signature]

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support
of Motion for Protective Order Granting a Temporary Stay of Discovery as to Fourteen
Subpoenas Issued to Non-Parties Concerning the WTCP Plaintiffs' Damages Claims, and the

annexed Declaration in Support of Motion for Protective Order Granting a Temporary Stay of Discovery as to Fourteen Subpoenas Issued to Non-Parties Concerning the WTCP Plaintiffs' Damages Claims, executed August 14, 2008 by Jason T. Cohen, and upon all prior pleadings and proceedings had herein, Plaintiffs World Trade Center Properties LLC, 1 World Trade Center LLC, 2 World Trade Center LLC, 3 World Trade Center LLC, and 4 World Trade Center LLC, and non-parties Stanley Chera, Jane Goldman, Katja Goldman, Dorian Goldman, Lloyd Goldman, Emzon Shung, Michael Sonnenfeldt, Friedman LLP, Silverstein East WTC Facility Manager LLC, Silverstein WTC LLC, Silverstein WTC Properties LLC, WTC Management and Development LLC, WTC Investors LLC and BLDG Management Company Inc., by their attorneys, Flemming Zulack Williamson Zauderer LLP, will move this Court for an Order, pursuant to Fed. R. Civ. P. 26(c), temporarily staying discovery of the following non-parties which the Aviation Defendants have subpoenaed for depositions and/or document productions concerning the WTCP Plaintiffs' damages claims:

Stanley Chera,
Jane Goldman,
Katja Goldman,
Dorian Goldman,
Lloyd Goldman,
Emzon Shung,
Michael Sonnenfeldt,
Friedman LLP,
Silverstein East WTC Facility Manager LLC,
Silverstein WTC LLC,
Silverstein WTC Properties LLC,
WTC Management and Development LLC,
WTC Investors LLC, and
BLDG Management Company Inc.

A temporary stay is sought until such time as this Court issues an Order disposing of the Aviation Defendants' Motion for Summary Judgment as to the WTCP Plaintiffs' damages claims with respect to WTC 1, 2, 3 (formerly known as 5) and 4.

Pursuant to Local Civil Rule 6.1(b), opposing affidavits or memoranda of law, if any, shall be served within ten business days after the service of these moving papers, and any reply affidavits or memoranda of law shall be served within five business days after the service of such answering papers. Pursuant to Local Civil Rule 6.1(c) and to Rule 2(D) of the Individual Rules of the Honorable Alvin K. Hellerstein, no oral argument shall be had on this cross-motion unless directed by further order of this Court.

Dated: August 14, 2008
New York, New York

FLEMMING ZULACK WILLIAMSON
ZAUDERER LLP

By: 

Jason T. Cohen, Esq.

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- and -

Attorneys for the Following Fourteen Non-
Parties Served With Subpoenas:

Stanley Chera
Jane Goldman
Katja Goldman
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